

**REMARKS**

The office action of January 21, 2005 has been reviewed and its contents carefully noted. Reconsideration of this case, as amended, is requested. Claims 1 through 12 remain in this case, claims 3 being cancelled and claims 5-12 being added by this response.

**Rejection(s) under 35 U.S.C. §102**

Claims 1-4 were rejected under 35 U.S.C. 102(b) as being anticipated by Crane, Jr et al. (U.S. Patent No. 6,307,258) hereinafter merely "Crane". Applicant respectfully disagrees with the rejection.

Claim 1 recites, *inter alia*:

"a top seal plate attached on the case and sealing the at least one window;whereby a conventional, thicker IC chip can be accommodated in the window region with the top seal plate attached thereon sealing the window" (Emphasis added)

As understood by Applicants, Crane is related to a semiconductor die package having an **open cavity** that **exposes a semiconductor die held in the package to the environment** and, more particularly, to an open-cavity semiconductor die package adapted to enable a person to place a **finger tip** on the semiconductor die. (Emphasis added)

Applicants respectfully submit that Crane does not teach a top seal plate attached on the case and sealing the at least one window; whereby a conventional, thicker IC chip

can be accommodated in the window region with the top seal plate attached thereon sealing the window, as so claimed in claim 1.

Applicants further respectfully submit the *Crane* actually teach away from claim in that *Crane* relates to an open-cavity semiconductor die package adapted to enable a person to place a finger tip on the semiconductor die. Whereas, the present invention claims a top seal plate attached on the case and sealing the at least one window, as recited in claim 1.

Therefore, *Crane* neither teaches nor suggests the claimed invention. It is respectfully suggested that the rejection of independent claim 1 as being anticipated by *Crane* is overcome. For similar reasons as that of the traversing on claim 1, independent claim 4 is allowable as well. Dependent claims 2 and 1-12, being dependent upon and further limiting independent claims 1 and 4 respectively, should also be allowable for that reason, as well as for the additional recitations they contain. Reconsideration and withdrawal of the rejection are respectfully requested.

### Conclusion

Applicant believes the claims, as amended, are patentable over the prior art, and that this case is now in condition for allowance of all claims therein. Such action is thus respectfully requested. If the Examiner disagrees, or believes for any other reason that direct contact with Applicants' attorney would advance the prosecution of the case to finality, he is invited to telephone the undersigned at the number given below.

"Recognizing that Internet communications are not secured, I hereby authorize the PTO to communicate with me concerning any subject matter of this application by electronic mail. I understand that a copy of these communications will be made of record in the application file."

Respectfully submitted,

WU & CHEUNG, LLP

Dated: April 20, 2005

By: 

Charles C.H. Wu, Esq.

REG. NO. 39,081

98 DISCOVERY

IRVINE, CALIFORNIA 92618-3105

TEL: 949-251-0111

FAX: 949-251-1588

E-MAIL: CCHWU @ EARTHLINK.NET

USPTO CUSTOMER NO.: 25864